

EXHIBIT H

MIRIAM LEESER PHD
SINGULAR COMPUTING vs GOOGLE

March 08, 2023
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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

* * * * *
SINGULAR COMPUTING, LLC.,
Plaintiff,
vs.
GOOGLE, LLC.,
Defendant.
* * * * *

No. C.A. No:
1:19-cv-12551-FDS

VIDEOCONFERENCE DEPOSITION OF MIRIAM LEESER, Ph.D.,
Deposition taken with all parties appearing remotely,
on Wednesday, March 8, 2023, commencing at 10:59 a.m.

Court Reporter:
Pamela J. Carle, LCR, RPR, CRR

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1 Q. Who is that?

2 A. Her name is Jane Evans.

3 Q. And you and Joe Bates were both
4 friendly with Jane Evans when you were at school
5 at Cornell, is that correct?

6 A. That's my recollection, yeah.

7 Q. Would you describe Joe Bates as a
8 friend as well, or just an acquaintance through
9 mutual friends?

10 A. I don't know Joe Bates well. I don't
11 know him -- I just don't know him well.

12 Q. Since Cornell, have you spoken to Joe
13 Bates?

14 A. I have recollections of running into
15 him once or twice. I don't remember the details.
16 I did talk to him because he personally called me
17 and asked me to be an expert witness on this case.

18 Q. And what did you say?

19 A. I said no.

20 Q. Why?

21 A. So I had already been contacted by
22 Google before he called me, and I'd already
23 accepted to be an expert witness on the case for
24 Google, for the lawyers who represent Google.

25 Q. So I believe you testified earlier that

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1 Google contacted you around two years ago for the
2 first time?

3 A. Yes. Can I correct that? Google
4 didn't contact me. The lawyers associated with the
5 case. Google is an entity that -- so the lawyers
6 associated with this case contacted me. I'm
7 guessing it's more than two years ago, I don't
8 remember the time frame.

9 Q. Okay. Do you remember how long between
10 Google's lawyers first contacting you and you
11 hearing from Joe Bates, how much time elapsed
12 between those two events?

13 A. They were relatively close together. I
14 don't remember precisely, but I think it was one or
15 two days.

16 Q. I just have, actually, I think a few
17 more questions, and then following that I'm going
18 to ask that we take sort of a break so I can talk
19 with my team and discuss whether or not there are
20 any additional questions to ask.

21 So I think we're nearing the end, but
22 I'll ask a few more questions, and then hopefully
23 we'll be near the end of our deposition. I know
24 that disappoints you.

25 Just a question about the VFLOAT